



THE CITY OF NEW YORK  
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September 9, 2016

**BY ECF**

Honorable William H. Pauley III  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Jasmine Bridgeforth, et al. v. City of New York, et al.  
16-CV-273 (WHP) (RLE)

Your Honor:

I am the Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, representing the defendants in the above-referenced matter. I write jointly on behalf of the parties to request a sixty-day extension of time for fact discovery, from September 30, 2016, to November 29, 2016.

The primary reason for seeking this enlargement of time is the complexity of this case and the underlying police investigation, and the number of parties (three plaintiffs and five defendants, with the possibility of additional nonparty depositions). These issues were not readily apparent when the parties first met with the Court to set the pretrial schedule. See Dkt. No. 16. In particular, since that time, NYCHA, ACS, family court, and medical records have assumed a greater role in discovery efforts than originally anticipated.

In addition, the undersigned has an usually high number of depositions already scheduled this month and next (eleven and counting). The undersigned is also scheduled for trial on October 31, 2016, in the case of Joel John v. City of New York, et al., No. 14-CV-5721 (LDH) (CLP), pending in the Eastern District of New York. The undersigned is also preparing

pre-trial submissions this month in the case of Ashique Soomro v. City of New York, et al., No. 13-CV-187 (LTS), pending in this District.

Accordingly, the parties respectfully request that the deadline for fact discovery be extended to November 29, 2016. This would also require additional modification of the scheduling order at Docket No. 16. Accordingly, the parties also propose that:

- On or before January 3, 2017, the parties file a Joint Pretrial Order (currently set for November 4, 2016); and
- The Court adjourn the Final Pretrial Conference to a date and time convenient the Court after January 3, 2017 (currently scheduled for November 18, 2016, at 10:00 a.m.).

Thank you for your consideration.

Respectfully submitted,

\_\_\_\_\_/s/  
Rhiana Swartz  
Senior Counsel

cc: via ECF  
Ryan Lozar, Esq.  
*Attorney for Plaintiff*